

ZULIMA V. FARBER
ATTORNEY GENERAL OF NEW JERSEY

Division of Law
124 Halsey Street
P.O. Box 45029
Newark, New Jersey 07101

By: Kevin R. Jespersen
Deputy Attorney General
(973) 648-7454

SUPERINTENDENT OF THE NEW JERSEY
STATE POLICE
PRIVATE DETECTIVE UNIT
Docket No. POL 05535-2004N

IN THE MATTER OF THE SUSPENSION :	
OR REVOCATION OF THE LICENSE :	Administrative Action
OF :	
:	FINAL CONSENT ORDER
JOHN D'AGOSTINO, CAROL ANN :	
D'AGOSTINO AND HAYNES SECURITY, :	
INC. :	
LICENSE NO. 3137 :	
:	
TO ENGAGE IN THE PRIVATE :	
DETECTIVE BUSINESS IN THE STATE :	
OF NEW JERSEY :	

This matter being opened to the Superintendent of the New Jersey State Police (the "Superintendent") by Deputy Attorney General Kevin R. Jespersen, appearing for Zulima V. Farber, Attorney General of New Jersey, and Joseph P. La Sala, Esq., appearing for McElroy, Deutsch, Mulvaney & Carpenter, LLP, attorneys for the Respondents John D'Agostino, Carol Ann D'Agostino and Haynes Security, Inc.; Haynes Security, Inc. ("Haynes") being

the sole holder of New Jersey Private Detective License No. 3137; the Superintendent having notified Haynes Security, Inc. by letter dated May 17, 2004, that the New Jersey Private Detective License held by Haynes would not be renewed; Haynes having demanded a hearing with regard to the Superintendent's decision not to renew Haynes' New Jersey Private Security License; the matter having been transmitted to the Office of Administrative Law for hearing; the matter having been filed with the Office of Administrative Law under Docket Number POL 05535-2004N; the Superintendent having temporarily extended Haynes' Private Security License during the pendency of the matter in the Office of Administrative Law; John D'Agostino being a defendant in the criminal matter entitled State v. Haynes Security, Inc., Superior Court, Law Division, Essex County (Indictment No. 04-02-00011-S) (the "Criminal Case"); John D'Agostino having, simultaneously with the entry of this Consent Order, entered into a plea agreement in the Criminal Case; in order to avoid further proceedings in this case, all of the Respondents having consented and agreed to each and every term of this Consent Order; the Superintendent having determined that the within disposition is adequate to protect the public safety and welfare at this time; and for other good cause shown,

IT IS on this _____ day of May, 2006,

ORDERED:

1. John D'Agostino hereby admits that, while an officer of Haynes, he knowingly caused Haynes to fail to register certain classes of employees with the Private Detective Unit as required under the Private Detective Act, N.J.S.A. 45:19-8, et seq. John D'Agostino further admits that, while an officer of Haynes, he knowingly caused Haynes to fail to register certain Haynes employees when John D'Agostino knew those individuals possessed criminal records that could potentially bar them from employment in the New Jersey security industry, in violation of the Private Detective Act, N.J.S.A. 45:19-8, et seq.

2. The Superintendent's denial of the renewal of Private Detective License No. 3137, the license held by Haynes, is hereby vacated, and Haynes' Private Detective License No. 3137 is hereby renewed as of June 1, 2004.

3. Haynes' Private Detective license shall expire on September 1, 2006.

4. Haynes shall promptly submit an application to renew Private Detective License No. 3137.

5. Nothing in this Consent Order shall prevent the Superintendent from lawfully denying the renewal of Haynes' Private Detective License in accordance with the provisions of the Private Detective Act and the regulations under the act; provided, however, that no act or omission committed by John D'Agostino or Haynes prior to May 17, 2004, or the disposition of this case or the

related Criminal Case, may serve as a basis to deny the renewal of Haynes' license.

6. John D'Agostino shall forthwith relinquish all ownership interest in Haynes.

7. John D'Agostino shall have no ownership interest whatsoever in, and shall not be an operator of, any entity that holds either a Private Detective License issued under the provisions of the Private Detective Act, N.J.S.A. 45:19-8, et seq., or a license issued under the Security Officer Registration Act, N.J.S.A. 45:19A-1, et seq.

8. John D'Agostino shall not be an officer, director, member, partner, consultant or employee of any entity that holds either a Private Detective License issued under the provisions of the New Jersey Private Detective Act, N.J.S.A. 45:19-8, et seq., or a license issued under the Security Officer Registration Act, N.J.S.A. 45:19A-1, et seq.; provided, however, that John D'Agostino may be an employee of, or act as a consultant for, Haynes for a period for one year commencing as of the date of the entry of this Consent Order.

9. John D'Agostino shall be permanently ineligible to obtain a license under the provisions of either the New Jersey Private Detective Act, N.J.S.A. 45:19-8, et seq., or a license issued under the Security Officer Registration Act, N.J.S.A. 45:19A-1, et seq.

10. John D'Agostino shall be permanently barred from acting as a qualifying individual for any entity that holds either a Private Detective License issued under the provisions of the New Jersey Private Detective Act, N.J.S.A. 45:19-8, et seq., or a license issued under the Security Officer Registration Act, N.J.S.A. 45:19A-1, et seq.

11. John D'Agostino shall be permanently barred from being on the premises of any entity that holds either a Private Detective License issued under the provisions of the New Jersey Private Detective Act, N.J.S.A. 45:19-8, et seq., or a license issued under the Security Officer Registration Act, N.J.S.A. 45:19A-1, et seq.; provided, however, that, during the period of time that John D'Agostino may act as a consultant or as an employee to Haynes under the terms of this Consent Order, John D'Agostino may be on the premises of Haynes.

12. Haynes shall forthwith enter into a contract with the current independent monitor, Edwin H. Stier of Stier Anderson, LLC that:

a. Shall authorize and require Mr. Stier to oversee the entire operation of Haynes to ensure that Haynes complies with all local, state and federal laws, rules and regulations, for a period of two years commencing as of the date of the entry of this Consent Order;

b. Shall authorize and require Mr. Stier to submit to the Private Detective Unit of the New Jersey State Police and to the Attorney General, or her designee, a report once a quarter during the term of the contract with regard to Haynes' compliance with all local, state and federal law; and

c. Shall allow the Private Detective Unit and the Attorney General, or her designee, to directly communicate with Mr. Stier from time to time during the term of the contract regarding Haynes' compliance with all local, state and federal laws, rules and regulations.

13. The contract between Haynes and Mr. Stier shall be subject to the review and approval of the Attorney General.

14. The entire costs of the contract with Mr. Stier shall be borne by Haynes, and the State of New Jersey shall have no responsibility whatsoever for any cost or expense arising from Mr. Stier's service regarding Haynes.

15. Nothing in this Consent Order shall limit in any way the authority of the Private Detective Unit to conduct a lawful investigation or inspection of Haynes as permitted under the provisions of the Private Detective Act, N.J.S.A. 45:19-8, et seq., or the Security Officer Registration Act, N.J.S.A. 45:19A-1, et seq.

16. Haynes and John D'Agostino hereby agree and consent that any material violation of any term of this Consent Order shall

constitute sufficient grounds to terminate, or to decline to renew, any license that Haynes may then hold under either the Private Detective Act, N.J.S.A. 45:19-8, et seq., or under the Security Officer Registration Act, N.J.S.A. 45:19A-1, et seq.

17. This Order shall be a full, complete and final resolution of the matter now pending before the Office of Administrative Law entitled In re John D'Agostino, Carol Ann D'Agostino and Haynes Scurity, Inc. (Docket No. POL 05535-2004N), and the parties hereby consent to the Office of Administrative Law closing the matter and returning the matter to the Superintendent.

Colonel Joseph R. Fuentes
Superintendent of the New Jersey
State Police

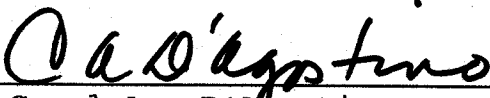
I have read the within Order.
I understand the Order and I
agree to be bound by its terms
and conditions. I hereby
consent to the entry of this
Order.

Haynes Security, Inc.

By: _____


John J. D'Agostino
President

John J. D'Agostino,
individually

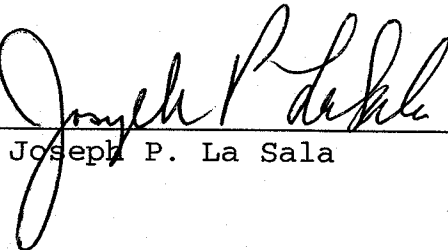


Carol Ann D'Agostino,
individually

We hereby consent to the form
and entry of this Order.

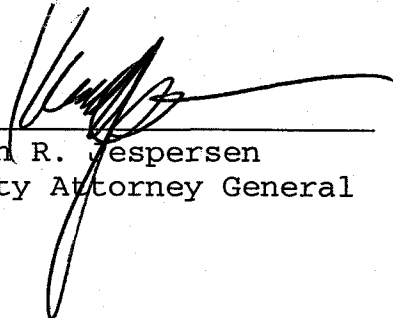
McElroy, Deutsch, Mulvaney &
Carpenter, LLP,
Attorneys for the Respondents
John D'Agostino, Carol Ann
D'Agostino and Haynes
Security, Inc.

By: _____


Joseph P. La Sala

Zulima V. Farber
Attorney General of New Jersey

By: _____


Kevin R. Jespersen
Deputy Attorney General